IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
VS.)	No.: 13CR334 MV
)	
CRYSTAL TORRES,)	
)	
Defendant.)	

UNOPPOSED MOTION TO CONTINUE SENTENCING MEMORANDUM DEADLINE

COMES NOW, the defendant, Crystal Torres, by and through her attorney, John V. Butcher, Assistant Federal Public Defender, and entreats this Court to extend sentencing memorandum deadline to February 26, 2015.

In support of her motion, Ms. Torres states as follows:

- 1. Ms. Torres pled guilty to one count of aggravated assault with a dangerous weapon in violation of 18 U.S.C. § 113(a)(3). Ms. Torres is not in custody.
- Ms. Torres has significant mental and physical health issues. Defense counsel was seeking an update from her current mental health provider, Dr. Morton.
 Mr. Morton contacted defense counsel on February 26, 2015.
 - 3. The parties have been in contact in an attempt to use their and the Court's resources efficiently, to reduce litigation and attempt to resolve the instant case.
- 4. Defense counsel was out of the office due to illness February 17, 18, and 23, 2015.

- 5. Pursuant to local rules, defense counsel has contacted Assistant U.S. Attorney Elaine Ramirez. The government does not oppose this continuance.
- 6. This instant motion is the second request to continue sentencing memorandum deadline.

WHEREFORE, based on the foregoing, Ms. Torres respectfully requests that this Court extend the sentencing memorandum deadline until February 26, 2015.

I HEREBY CERTIFY THAT on the 27th day of February 2015, I filed the foregoing electronically through the CM/ECF system, which caused AUSA Elaine Ramirez to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

AND I FURTHER CERTIFY THAT on such date I served the foregoing by hand deliver/fax on the following non-CM/ECF Participants

Sandra Day, USPO

/s

Respectfully submitted,

FEDERAL PUBLIC DEFENDER 111 Lomas NW, Suite 501 Albuquerque, NM 87102 (505) 346-2489

/s [Electronically filed]
JOHN V. BUTCHER, AFPD
Assistant Federal Public Defend